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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILINGS CASES

This document relates to:

All actions

| Master File No. 5:22-cv-07557-PCP (VKD)

**DECLARATION OF NEAL J. DECKANT
IN SUPPORT OF MOTION TO SEAL**

The Honorable P. Casey Pitts
Courtroom 8, 4th Floor

1 I, Neal J. Deckant declare as follows:

2 1. I am an attorney at law licensed to practice in the State of California. I am also a
3 member of the bar of this Court and a partner at Burson & Fisher, P.A., counsel of record for
4 Plaintiffs. I have personal knowledge of the facts set forth in this declaration, and, if called as a
5 witness, could and would competently testify thereto under oath.

6 2. Defendant produced certain documents containing information that it designated as
7 either Confidential or Highly Confidential – Attorney’s Eyes Only.

8 3. Some of the aforementioned documents or deposition testimony is being submitted
9 in support of Plaintiffs’ concurrently filed Notice of Motion and Motion for Leave to Amend
10 Complaint. Plaintiffs are filing this motion to seal to comply with their obligations under Local
11 Rule 79-5 and the protective order issued in the case. Plaintiffs take no position at this time on the
12 propriety of Defendant’s confidentiality designations, or whether they meet the “compelling
13 reasons” test for retaining confidentiality.

14 4. Plaintiffs wish to file the following documents under seal:

15 • Exhibit A (“Clean” Second Amended Consolidated Class Action Complaint):

16 documents that Defendant produced in this matter and designated as Confidential
17 and Attorneys’ Eyes Only:

18 • Page 10, line 22 through page 11, line 14.
19 • Page 13, line 13 through page 14, line 28.
20 • Page 19, line 2 through page 20, line 2.
21 • Page 26, line 11 through page 26, line 18.

22 • Exhibit B (“Redline” Second Amended Consolidated Class Action Complaint):

23 documents that Defendant produced in this matter and designated as Confidential
24 and Attorneys’ Eyes Only:

25 • Page 10, line 22 through page 11, line 14.
26 • Page 13, line 13 through page 14, line 28.
27 • Page 19, line 2 through page 20, line 2.
28 • Page 26, line 11 through page 26, line 18.

1
2 I declare under penalty of perjury under the laws of the United States and the State of
3 California that the foregoing is true and correct. Executed on April 1, 2025.
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/s/ Neal J. Deckant

Neal J. Deckant

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